

REMARKS/ARGUMENTS

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. Independent claim 14 has been amended hereby. Claims 14, 15, and 18 are pending for further examination.

Claims 14 and 18 have been rejected under 35 U.S.C. §103(a) as being obvious over Miller et al. (U.S. Pat. 5,959,869 "Miller"), in view of Siegel et al. (U.S. Pat. 4,413,260 "Siegel"), Barrett et al. (U.S. Pat. 5,214,761 "Barrett"), and Werth et al. (U.S. Pat. 4,369,442 "Werth"). Applicant respectfully submits that the amended claims are not rendered obvious by the prior art of record for at least the reasons presented herein. Thus, reconsideration and withdrawal of the rejections are respectfully requested.

The Office Action concedes that the combination of Miller, Siegel and Barrett fail to disclose "the first button being provided in a first displayed screen for the operator, the second button being provided in a second displayed screen for the manager, an interface being automatically displayed in the first screen and in the second screen when one of said buttons is used, said interface requiring a first code for enabling said first button to function as a request for adding one credit to the credit reserve in said file when this first button is touched, said interface requiring a second code for enabling said second button to function as a request for removing one credit from the credit reserve in said file when this second button is touched." To compensate for this shortcoming of the Miller, Siegel, Barrett combination, the Office Action introduces Werth. Applicant, however, respectfully submits that Werth does not cure the defects of the Miller, Siegel, Barrett

combination, and further, Werth actually teaches away from both applicant's invention and Miller.

According to the Office Action "Werth teaches restricting access to specific aspects of a vending machine to the owner [manager] (access of output registers only being available to owners, col. 4 lines 4-9) and restricting other specific aspects of a vending machine to the operator [serviceman] (system access is provided to servicemen, col. 4, lines 4-9), each accessed through entry of an input code (col. 4, lines 9-12), granting exclusive access to only the parties which have a right to said vending machine aspects." Unlike Applicant's claimed invention, however, which provides access code entry on the machine directly, Werth expressly teaches providing access code entry on a remote device.

According to Werth "this arrangement ensures a double check on the secrecy of the contents in the coin counter, if desired, since a first access code is required to read out the information from the coin counter and a second access code is needed to read out the information from the PCU" (Col. 2, line 66 – Col. 3, line 2).

Werth further teaches "the sensed and stored signals are adapted to be read out from registers by a *detachable, portable* collection unit (PCU) which can service a large number of vending machines" (Col. 1, lines 21-25). "The invention described in Applicants' parent application represents a significant improvement over a CPU system since vending machines are widely dispersed and can be moved, change ownership, etc. Also, after a period of time, if the validation codes become compromised, they too can be

easily changed” (Col. 1, lines 41-46). Applicant notes that “the invention described in the Applicants’ patent applicant” refers to the PCU of Werth.

According to the Office Action, Werth “provid(es) evidence that restricting access to different features intended for managers and operators using password protection was known to persons of ordinary skill.” Applicant respectfully disagrees. In light of the whole disclosure of Werth, what was known was providing a password to protect sensitive information on a portable device from the information collector. Had the owner/licensee had to key the access code in on the machine directly, as in the case with Applicant’s invention, the need for two passwords in the system of Werth would have been obviated. Since the owner/licensee would have to travel to the machine to check the coin register, they wouldn’t need a second password to protect the information from an information collector, they themselves would have to collect the information by traveling to the machine. Applicant submits that the portable nature of Werth’s disclosed PCU, allowing the owner/licensee to hire someone else to collect the information, is what created the need for a second password in Werth and that it would not be obvious at all to place that functionality in a standalone device.

Applicant respectfully submits that the espoused portability virtues of the PCU, such as “inasmuch as the PCU is portable, it can service a large number of vending machines,” cannot simply be ignored, as they are a part of the patent. Further, since the invention of Werth is expressly designed to be implemented on a PCU, Applicant disagrees that the access code feature of Werth can be plucked out of the disclosure,

removed from implementation in a portable device as taught by Werth, and placed into a combination with a standalone device. Therefore, as Werth teaches access codes entered into a device independent from the vending machine, Applicant submits that Werth does not teach the claimed:

said central processing unit operable to cause said display to display at least a first screen including at least the first button for the operator, and at least a second screen including at least the second button for the manager, wherein said first screen and said second screen further include an interface, being automatically displayable in at least one of the first screen and second screen when one of said specific buttons is used, said interface requiring a first code for using said first button to function as a request for adding one credit to the credit reserve in said file when this first button is touched, said interface requiring a second code for using said second button to function as a request for removing one credit from the credit reserve in said file when this second button is touched.

Further, Werth expressly teaches against a CPU based system, such as Applicant's and the system taught by Miller. Thus, Applicant respectfully submits that Werth cannot be combined with Miller, Siegel and Barrett to allegedly meet Applicant's claim.

Applicant claims "Digital audiovisual reproduction system, comprising a central processing unit controlling a display, a touch screen, and memory, through a multitask operating system comprising a tools and services library." Miller, according to the Office Action, discloses "a digital audiovisual reproduction system (fig. 2) comprising a central unit (processor 201 in fig. 1)..."

Werth, on the other hand teaches "since the PCU has its own built in accessing, interrogation, calculating and display function, it can dispense with the necessity of employing telephone lines or cables connected to say a central processing unit. The invention described in Applicants' parent applicant (the PCU) represents a very significant improvement over a CPU system" (Col. 1, lines 37-43).

Thus, Applicant respectfully submits that Werth cannot be combined with Miller, Siegel and Barrett. One of ordinary skill in the art, upon reading Werth's disclosure, would have read of the values of a PCU vs. a CPU based system and would have read of all of the disclosed shortcomings of CPU based systems. One of skill in the art would have learned that Werth teaches a PCU system to be superior to a CPU system, and that the invention of Werth is designed to be implemented in a PCU system. Thus, one of ordinary skill in the art would have been deterred from applying the teachings of Werth to CPU based systems to produce Applicant's claimed CPU based system.

Therefore, for at least these reasons, Applicant submits that Applicant's amended claim 14 is allowable over the prior art of record. Applicant further submits that even if the Examiner maintains the position that the applied references teach the claimed

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invention, a combination of those references is improper for at least the reason that Werth teaches against such a combination. Thus, reconsideration and withdrawal of the rejection is respectfully requested.

Claims 15 and 18 should be allowable at least based on their dependency from allowable independent claim 14.


For at least the foregoing reasons, Applicant respectfully submits that the invention defined by the amended claims is patentable over the prior art of record. Thus, withdrawal of the rejections and allowance of this application are earnestly solicited.

Should the Examiner have any questions regarding this case, or deem that any formal matters need to be addressed prior to allowance, the Examiner is invited to call the undersigned attorney at the phone number below.

Respectfully submitted,

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